

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DYNAENERGETICS EUROPE GMBH, and  
DYNAENERGETICS US, INC.,

Plaintiffs,

v.

PERFX WIRELINE SERVICES, LLC,

Defendants.

Civil Action No: 6:21-cv-00371

**DECLARATION OF JOHN PERRY IN SUPPORT OF DYNAENERGETICS’  
RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION TO TRANSFER VENUE**

I, John Perry, being over the age of 18 and competent to make the declarations herein, do hereby declare that:

1. I am one of the attorneys representing DynaEnergetics Europe GmbH and DynaEnergetics US, Inc. (collectively, “DynaEnergetics”) in this matter. I submit this Declaration in support of DynaEnergetics’ Response in Opposition to Defendant’s Motion to Transfer.

2. Attached hereto as Exhibit A is a true and correct copy of the September 8, 2021 transcript of the deposition of Charlie Thomas, Corporate Designee and Individually. [Filed Under Seal].

3. Attached hereto as Exhibit B is a true and correct copy of DynaEnergetics’ Reply in Support of DynaEnergetics’ Motion to Transfer to the Western District of Texas filed in *Perfx Wireline Services, LLC v. DynaEnergetics US, Inc.*, Civil Action No. 1:20-cv-03665-RM-MEH, Dkt. 35 (D. Colo. Mar. 19, 2021).

4. Attached hereto as Exhibit C is a true and correct copy of the Order Granting in Part and Denying in Part Yellow Jacket Oil Tools, LLC and G&H Diversified Manufacturing,

LP's Motion to Transfer entered in *DynaEnergetics Europe GmbH v. Yellow Jacket Oil Tools, LLC*, Civil Action No. 6:20-cv-01110, Dkt. 41 (W.D. Tex. Aug. 5, 2021).

5. Attached hereto as Exhibit D is a true and correct copy of the Order Granting DynaEnergetics' Motion to Transfer to the Western District of Texas entered in *XConnect, LLC v. DynaEnergetics US, Inc.*, Civil Action No. 1:20-cv-03665-RM-MEH, Dkt. 52 (D. Colo. Sept. 15, 2021).

6. Attached hereto as Exhibit E is a true and correct copy of DynaEnergetics' Objections and Responses to PerfX's First Set of Interrogatories Related to Venue (Nos. 1-5), served on August 5, 2021.

7. Attached hereto as Exhibit F is a true and correct copy of a press release by Ranger Energy Services titled "Ranger Energy Services, Inc. Acquires PerfX Wireline Services" dated July 9, 2021.

8. Attached hereto as Exhibit G is a true and correct copy of PerfX's Objections and Answers to DynaEnergetics' First Set of Venue Interrogatories, served on July 22, 2021.

9. Attached hereto as Exhibit H is a true and correct copy of the Order Denying G&H Diversified Manufacturing, LP's Petition for a Writ of Mandamus entered in *In re G&H Diversified Manufacturing, LP*, No. 2021-176, Dkt. 17 (Fed. Cir. Sept. 27, 2021).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, pursuant to Section 1746 of Title 28 of the United States Code.

Dated: September 29, 2021

/s/ John G. Perry  
John G. Perry